

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**DEFENDANT GOOGLE LLC’S MOTION FOR ENTRY OF ORDER
REGARDING COORDINATION OF DISCOVERY**

1. Defendant Google LLC (“Google”), through its undersigned counsel, hereby respectfully moves for the entry of an Order Regarding Coordination of Discovery in the above-captioned action. The grounds for the motion are as follows:

2. As the Court is aware, a multi-district litigation with substantial legal and factual similarities to this case is currently pending in the U.S. District Court for the Southern District of New York, under docket number 1:21-md-3010-PKC (the “MDL”).

3. As referenced in the joint motion for entry of a protective order (ECF No. 96), the parties in this case have met and conferred regarding a proposed order allowing for coordination of discovery between this case and the MDL, to further the interests of judicial efficiency and reduce the burden on party and non-party witnesses. Through that process, the parties have prepared the proposed Order Regarding Coordination of Discovery (“Coordination Order”) attached as Exhibit A.

4. The Coordination Order reflects the parties’ agreements on many issues, and it identifies, as the parties’ competing proposals, some areas where they do not agree. One area where the parties agree is that the proposed order should not take effect unless and until it is entered in this case and in the MDL. *See* Ex. A ¶ 10.

5. For the reasons explained in Google's accompanying Brief Supporting Coordination Order, Google respectfully requests that the Court adopt Google's proposed language in the Coordination Order and then enter the Order.

Dated: April 28, 2023

Respectfully submitted,

FOR DEFENDANT GOOGLE LLC:

/s/ Tyler Garrett

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